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APR 14 2025

AFFIDAVIT OF JENNIFER NAIMO

CLERK, U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

My name is Jennifer Naimo, and I know Darko and Virvina Pavlovski from a Frontier airlines flight Denver-Minneapolis on December 11th.

When I boarded the plane, I was situated next to a couple with a baby. Later I learned their names as Darko and Virvina Pavlovski. They were kind enough to offer me the aisle seat if I wanted it, and I also wanted to accommodate them because they had a small child. So, I sat in my assigned seat which was on the inside (next to the window) of the very last row on the plane.

I introduced myself to them both as we were all from Minnesota, and I was admiring their child. I recall the father asking the flight attendant if she had a safety strap for the baby as they have them in Europe, and he wanted to be able to secure his child on the flight. He was informed by the flight attendant that they did not have such a strap. Darko had the baby out of the carrier and was holding him with his arms.

Later, I observed a pregnant woman with a mask and a lanyard came up to Darko and ask him if he was taking photos and videos of people. This caught my attention because I was talking with them and there was no videos or photos being taken so I thought it seemed strange.

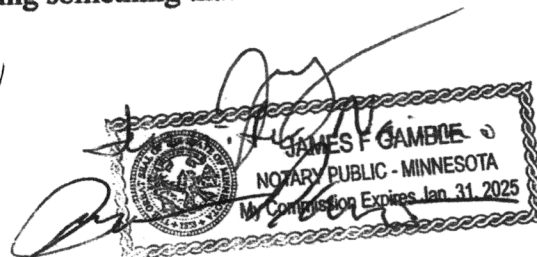
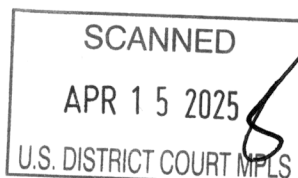
The pregnant woman with the mask and the lanyard proceeded to tell the father to take off his baby Bjorn carrier. He had it on, however, the baby was not inside of it. He complied and began to take it off and asked her why he had to take it off if the baby wasn't in it. She said that if he wasn't going to comply, then they would have to leave the airplane.

As he was taking it off, and putting it underneath his seat the baby started to cry and the pregnant woman with the mask and the lanyard asked the flight attendants if "this was going to be a problem?". Per my observation, the pregnant women was hinting at the crying baby.

Then, she left. I believe they all were discussing the situation. She proceeded to come back in a very short amount of time and told the couple that they would have to leave the plane.

I want to point out that at no time neither Darko nor Virvina were raising voices, using profanity, yelling or being obstructive. Neither I recall anyone grabbing or touching attendant's badges. In fact, they both were calm, polite and complying with the requests from the attendants and the pregnant women.

I was very confused/stunned as to what was taking place, as I've never seen anything like that happen before where nobody was yelling or being disruptive, or doing something that was



harmful to anybody else, and still was removed from the plane... Worse yet, with a baby and while being compliant.

I asked before they left if I could get their phone number because I wanted to be a witness to something that I thought was absolutely absurd.

Thank you very much for your attention!



Yours sincerely,
Jennifer Naimo
2351 Arthur St. NE
Minneapolis, MN, 55418

State of Minnesota
County of Hennepin

This instrument was acknowledged before me on 27 (date) by December 21, 2023 (name(s) of person(s)
(Seal, if any)

Signature of notarial officer 
Title (and Rank) My commission expires: Jan 31 2025

